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8 Attorneys for Plaintiff and Cross-Defendant
9 CHURCH OF SCIENTOLOGY OF CALIFORNIA

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF LOS ANGELES

12	CHURCH OF SCIENTOLOGY OF)	Case No. C 420 153
13	CALIFORNIA, a California)	
14	Corporation,)	(Severed Action)
15)	
16	Plaintiff,)	REQUESTS FOR ADMISSION
17)	PROPOUNDED TO CROSS-
18	v.)	COMPLAINANT GERALD ARMSTRONG
19)	BY CROSS-DEFENDANT CHURCH OF
20	GERALD ARMSTRONG, et al.,)	SCIENTOLOGY OF CALIFORNIA
21)	
22	Defendants.)	
23)	
24	_____)	
25	AND RELATED CROSS-ACTION.)	
26	_____)	

27 TO CROSS-COMPLAINANT GERALD ARMSTRONG AND TO HIS ATTORNEY
28 OF RECORD:

PLEASE TAKE NOTICE that Cross-Defendant CHURCH OF
SCIENTOLOGY OF CALIFORNIA hereby requests that Cross-
Complainant GERALD ARMSTRONG admit, pursuant to Code of Civil
Procedure, Section 2033, the truth of each of the following
matters of fact within thirty (30) days after the date of
service of this request.

1 REQUEST FOR ADMISSIONS

2 REQUEST FOR ADMISSION NO. 1:

3 Admit that your June 8, 1982 letter to John Peterson (a
4 copy of which is attached hereto as Exhibit "A") is not
5 completely true and accurate.

6 REQUEST FOR ADMISSION NO. 2:

7 Admit that after you left the Church of Scientology on
8 December 12, 1981, you attended one or more EST seminars.

9 REQUEST FOR ADMISSION NO. 3:

10 Admit that you dropped out of High School and also college
11 before you ever joined the Church of Scientology or took any
12 Scientology courses or read any Scientology literature.

13 REQUEST FOR ADMISSION NO. 4:

14 Admit that you had no personal or written contact with L.
15 Ron Hubbard after March 1, 1980.

16 REQUEST FOR ADMISSION NO. 5

17 Admit that you participated in a project or "mission" in
18 October of 1974, in which one of the objects or "targets" was
19 to place disclaimer warnings in Scientology books to the effect
20 that Scientology is an applied religious philosophy that does
21 not cure medical illnesses.

22 REQUEST FOR ADMISSION NO. 6:

23 Admit that auditing within the context of Scientology is a
24 spiritual process.

25 REQUEST FOR ADMISSION NO. 7:

26 Admit that in a deposition in the case of Van Schaick v.
27 Church of Scientology of California, et al., No. 79-2491-G,
28 on April 9, 1984, you stated under oath that the so called

1 "Fair Game Policy" is understood by Scientology parishioners
2 as barring recourse to ecclesiastical courts or justice
3 systems.

4 REQUEST FOR ADMISSION NO. 8:

5 Admit that you have no knowledge that the so called
6 "Suppressive Person Declares" concerning you were not shown by
7 defendant Church of Scientology to anyone outside of the Church
8 of Scientology, its agents or employees.

9 REQUEST FOR ADMISSION NO. 9:

10 Admit that auditing was never represented to you as being
11 totally confidential; that you knew or reasonably should have
12 known that auditing information would be discussed among your
13 Case Supervisors and other (technical) ministerial personnel.

14 REQUEST FOR ADMISSION NO. 10:

15 Admit that you, during the time you were on the staff of
16 the Church of Scientology, failed to strictly adhere to all of
17 the oral and written policies, directions, and requirements of
18 the Church of Scientology.

19 REQUEST FOR ADMISSION NO. 11:

20 Admit that your marriage to Terri (Gillham) Gamboa was
21 conducted as both a secular, civil ceremony as well as a
22 Scientology religious ceremony.

23 REQUEST FOR ADMISSION NO. 12:

24 Admit that you received telephone calls and/or letters
25 from your family (i.e. mother, father, brothers, and/or sister)
26 throughout the time you were on the staff of the Church of
27 Scientology.

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1 REQUEST FOR ADMISSION NO. 13:

2 Admit that, during the time you were on the staff of the
3 Church of Scientology, you never requested a leave of absence
4 to return to school or enroll in any institution of higher
5 education.

6 REQUEST FOR ADMISSION NO. 14:

7 Admit that people who are hostile to Scientology are not
8 entitled to the protection of Scientology codes and procedures.

9 REQUEST FOR ADMISSION NO. 15:

10 Admit that you received compensation for your work as
11 a staff member of the Church of Scientology.

12 REQUEST FOR ADMISSION NO. 16:

13 Admit that you received compensation in the form of
14 free services, including but not limited to auditing, in return
15 for your work as a staff member of the Church of Scientology.

16 REQUEST FOR ADMISSION NO. 17:

17 Admit that you received compensation in the form of
18 food, lodging, transportation, medical and dental care, in
19 return for your work as a staff member of the Church of
20 Scientology.

21 REQUEST FOR ADMISSION NO. 18:

22 Admit that you provided assistance, for no compensation, to
23 some litigants against the Church of Scientology, or their
24 attorneys, whether in the form of written declarations or
25 affidavits, trial preparation, or assistance in drafting
26 pleadings including, but not limited to, interrogatories,
27 Requests for Production and Requests to Admit.

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1 REQUEST FOR ADMISSION NO. 19:

2 Admit that, since 1982, you have not enrolled in college.

3 REQUEST FOR ADMISSION NO. 20:

4 Admit that, since 1982, you have not applied for admission
5 to a four year or a two year college program.

6 REQUEST FOR ADMISSION NO. 21:

7 Admit that you have offered to serve and have been
8 identified as an actual or potential witness in at least ten
9 cases pending against any Church of Scientology.

10 REQUEST FOR ADMISSION NO. 22:

11 Admit that you have not, since the time you left the
12 Church of Scientology, sought treatment for any psychological
13 disorder(s) from a licensed psychiatrist, psychotherapist, or
14 psychologist other than Margaret Singer.

15 REQUEST FOR ADMISSION NO. 23:

16 Admit that any services or treatment you have obtained,
17 since, 1981, from a psychiatrist, psychotherapist, or
18 psychologist has been in preparation for and/or anticipation of
19 litigation between yourself and the Church of Scientology.

20 REQUEST FOR ADMISSION NO. 24:

21 Admit that you took courses while you were in the Church of
22 Scientology.

23 REQUEST FOR ADMISSION NO. 25:

24 Admit that you first learned about exteriorization while
25 you were in the Church of Scientology.

26 REQUEST FOR ADMISSION NO. 26:

27 Admit that you understood exteriorization to be existing
28

1 or being outside one's body while you were in the Church of
2 Scientology.

3 REQUEST FOR ADMISSION NO. 27:

4 Admit that while you were in the Church of Scientology,
5 you understood one of the activities of auditing was the review
6 of not only the individual's past experiences in this
7 lifetime, but also in previous lifetimes as well.

8 REQUEST FOR ADMISSION NO. 28:

9 Admit that you gave auditing to other people while
10 you were in the Church of Scientology.

11 REQUEST FOR ADMISSION NO. 29:

12 Admit that you believed that, in conducting auditing of
13 other people, you were helping them.

14 REQUEST FOR ADMISSION NO. 30:

15 Admit that you discussed with Case Supervisors difficult
16 or unusual occurrences you discovered while conducting
17 auditing on others.

18 REQUEST FOR ADMISSION NO. 31:

19 Admit that you disclosed to third parties, other than Case
20 Supervisors, personal and confidential information you learned
21 about preclears during auditing of those persons.

22 REQUEST FOR ADMISSION NO. 32:

23 Admit that between the age of 17 and April 1984 you did
24 not receive professional counselling from any psychiatrist,
25 psychotherapist or psychologist.

26 If you fail to comply with the provisions of Section 2033
27 of the C.C.P. with respect to this request for admissions, each
28

1 of the matters of which an admission is requested will be
2 deemed admitted.

3 DATED: October 2, 1986

PETERSON AND BRYNAN

By John G. Peterson
JOHN G. PETERSON

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VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing _____

_____ and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner _____ a _____ of _____

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____ a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on _____, 19____, at _____ California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT
(other than summons and complaint)

Received copy of document described as _____

on _____ 19____.

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of LOS ANGELES, State of California.

I am over the age of 18 and not a party to the within action; my business address is: 8530 Wilshire Blvd. Suite 407 Beverly Hills, CA. 90211

On Oct. 2, 1986 I served the foregoing document described as Request for Admissions propounded to Cross-Complainant Gerald Armstrong by Cross-defendant Church of Scientology of California on see below

in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at: _____

addressed as follows.

Julia Dragojevic
5855 Topanga Canyon Blvd. Suite 400
Woodland Hills, CA. 91367

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail. Executed on _____, 19____, at _____ California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee. Executed on Oct. 2, 19 86 at Los Angeles

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Signature